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7 Attorneys for Plaintiff
8 WILLIAM J. HOFFMAN, Receiver

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 WESTERN DIVISION

12 WILLIAM J. HOFFMAN, Court-
appointed permanent receiver for
13 Defendant Nationwide Automated
Systems, Inc., Relief Defendants Oasis
14 Studio Rentals, LLC, Oasis Studio
Rentals #2, LLC, Oasis Studio
15 Rentals #3, LLC, and their subsidiaries
and affiliates,

16 Plaintiff,

17 v.

18 GERALD EHRENS, WILMA EHRENS,
19 RIVIERA INVESTMENTS, L.P., a
Nevada limited partnership, FIRST
20 ABBY CORPORATION, a Nevada
corporation, AMGEST LTD. a Delaware
21 corporation,

22 Defendants.

Case No. CV15-05747 SJO (FFMx)

REQUEST TO CLERK FOR ENTRY OF
DEFAULT OF DEFENDANT
AMGEST LTD.

Ctrm: 1 - 2nd Floor
Judge: Hon. S. James Otero

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

2 Plaintiff William J. Hoffman of Trigild, Inc. ("Receiver"), the Court-
3 appointed permanent receiver for Nationwide Automated Systems, Inc. ("NASI"),
4 Oasis Studio Rentals, LLC, Oasis Studio Rentals #2, LLC, Oasis Studio
5 Rentals #3, LLC, and their subsidiaries and affiliates ("Receivership Entities"), in
6 that Securities and Exchange Commission enforcement action styled as *Securities*
7 *and Exchange Commission v. National Automated Systems, Inc., et al.*, United
8 States District Court, Central District of California, Case No. 14-CV-07249-SJO
9 (FFMx), by and through counsel, hereby requests that the clerk of the above-entitled
10 Court enter default in this matter against Defendant Amgest Ltd. ("Amgest") on the
11 ground that Amgest has failed to appear or otherwise respond to the properly served
12 Complaint within the time prescribed by the Federal Rules of Civil Procedure.

13 On July 29, 2015, the Receiver filed the Complaint in the above-entitled
14 action. Copies of the Complaint and Summons issued by the Court were then
15 served on Bruce Gardiner, as a registered officer of the corporation, on
16 September 14, 2015, as evidenced by the proof of service on file with this Court.
17 (Dkt. No. 21, Declaration of Tim C. Hsu ("Hsu Decl."), Exh. A.) Accordingly,
18 pursuant to the Federal Rules of Civil Procedure, Amgest's response was due
19 October 5, 2015. *See* Fed. R. Civ. Proc. Rule 4(h)(1)(B), 12(a)(1)(A).

20 On October 9, 2015, after Amgest failed to file or serve any responsive
21 pleading or motion to the Complaint, counsel for the Receiver sent a letter to
22 Mr. Gardiner, via overnight mail, informing him of the Receiver's intent to seek
23 entry of default against Amgest and subsequently seek entry of judgment thereon.
24 Additionally, this letter was also sent via overnight mail and email to Gerald Ehrens
25 who is believed to be the owner of Amgest. (Hsu Decl., ¶ 4, Exh. B.)

26 Notwithstanding proper service of the Summons and Complaint, and the
27 Receiver's counsel's subsequent letter, as of the date of this filing, Amgest has not
28

1 filed any responsive pleading or motion, or otherwise made any appearance in this
2 action. (Hsu Decl., ¶ 5.)

3 Accordingly, the Receiver hereby respectfully requests that the default be
4 immediately entered as against Amgest.

5
6 Dated: October 16, 2015

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
DAVID R. ZARO
TED FATES
TIM C. HSU

9
10 By: /s/ Tim C. Hsu

TIM C. HSU
Attorneys for Receiver
WILLIAM J. HOFFMAN

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